

**REMARKS**

Claims 1-3 and 5-18 are pending in this application, with claims 1 and 2 being independent. For the reasons set forth below, Applicants respectfully submit that all pending claims are patentable over the cited prior art.

**Claim Rejections - 35 U.S.C. § 103**

Claims 1-3 and 5-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over PCT Publication Number WO 02/19369, which corresponds to the U.S. Patent Number 6,891,331. Applicants respectfully traverse this rejection for at least the following reasons. The following remarks reference the U.S. Patent Number 6,891,331 issued to Ashida (hereinafter “Ashida”) because the PCT application number WO 02/19369 was published in Japanese.

Claim 1 recites a method of manufacturing a plasma display panel, wherein a structure of the plasma display panel is formed with photolithography; and wherein at least one of a display electrode, a black layer, an address electrode or a partition wall of the structures of the plasma display panel, in a process of forming the structure, is exposed using a plurality of photomasks with a same pattern and a different aperture width of an exposure part, with a different amount of exposure, an exposure amount radiated from the light source when the exposure is made by a photomask with a longer aperture width is larger than an exposure amount radiated from the light source when the exposure is made by a photomask with a shorter aperture width, wherein the exposure amount is determined by exposure intensity or exposure time.

Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1 because Ashida, at a minimum, fails to describe or suggest a method of manufacturing a plasma display panel, wherein (1) at least one of a display electrode, a black layer, an address electrode

or a partition wall of the structures of the plasma display panel, in a process of forming the structure, is exposed using a plurality of photomasks with a same pattern and a different aperture width of an exposure part with a different amount of exposure and (2) an exposure amount radiated from the light source when the exposure is made by a photomask with a longer aperture width is larger than an exposure amount radiated from the light source when the exposure is made by a photomask with a shorter aperture width, wherein the exposure amount is determined by exposure intensity or exposure time, as recited in claim 1 (emphasis added).

Ashida describes a method for manufacturing electrodes that can effectively suppress edge-curl when metal electrodes such as bus electrodes and data electrodes are patterned by a photolithography method. Ashida at Abstract. To do so, Ashida in one implementation, describes that the PDP structure is formed using two photomasks. Ashida at col. 8, line 40 to col. 9, line 5 and FIG. 5. In particular and referring to FIG. 5 of Ashida, a first photomask (53A) having a width W1 is used to expose a metal electrode layer (A51) and a second photomask (53B) having a width W2 is used to expose a different metal electrode layer (B56) (emphasis added). *Id.*

To this end, Ashida is similar to the subject matter of claim 1, using a plurality of photomasks having a different aperture width. However, in applying the plurality of photomasks to form the PDP structure, Ashida is completely different from claim 1. In particular and as noted above, Ashida uses the plurality of photomasks to expose a different metal layer and not the same metal layer (e.g., first photomask (53A) is used to expose metal electrode layer (A51) and second photomask (53B) is used to expose metal electrode layer (B56)). As such, Ashida does not describe or suggest a method of manufacturing a plasma display panel, wherein at least one of a display electrode, a black layer, an address electrode or a partition wall of the structures

of the plasma display panel, in a process of forming the structure, is exposed using a plurality of photomasks with a same pattern and a different aperture width of an exposure part with a different amount of exposure, as recited in claim 1 (emphasis added).

Furthermore, and even assuming for the sake of argument that Ashida teaches the above-recited feature to which Applicants do not concede, Ashida still fails to describe or suggest a method of manufacturing a plasma display panel, wherein an exposure amount radiated from the light source when the exposure is made by a photomask with a longer aperture width is larger than an exposure amount radiated from the light source when the exposure is made by a photomask with a shorter aperture width, wherein the exposure amount is determined by exposure intensity or exposure time, as recited in claim 1 (emphasis added).

To the contrary, Ashida expressly teaches that exposure amount through the plurality of photomasks is the same. Ashida at col. 8, line 53 to col. 9, line 14 (stating that exposure conditions through exposure mask (53A) and exposure mask (53B) are the same). As such, Ashida does not describe or suggest the above-recited features.

The Final Office Action asserts that in at least page 29 of the PCT publication, Ashida discloses the above-recited feature. In particular, the Final Office Action asserts that Ashida teaches “the thickness of the portion exposed with the longer aperture width to be greater than the portion exposed with the shorter aperture width.” Final Office Action at page 3, lines 10-12. Applicants cannot confirm the validity of this assertion because the PCT publication is in Japanese. However, Applicants have reviewed the corresponding U.S. Patent ‘331 and do not see any such description therein. Therefore, Applicants respectfully request that the Examiner point out such alleged teaching in the corresponding U.S. Patent should the Examiner wish to maintain this position.

For the foregoing reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1, along with its dependent claims.

Claim 2 includes features similar to the above-recited features of claim 1. Therefore, for at least the reasons presented above with respect to claim 1, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 2, along with its dependent claims.

### **Dependent Claims**

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Because claims 1 and 2 are allowable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also allowable. In addition, it is respectfully submitted that the dependent claims are allowable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 103 be withdrawn.

### **Conclusion**

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's

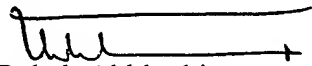
**Application No.:** 10/511,750

amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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